

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

**UNITED STATES OF AMERICA,
Plaintiff,**

vs.

No. 1:19-cr-10040-JTF-1

**JEFFREY YOUNG,
Defendant.**

MOTION TO FIND DEFENDANT INDIGENT FOR PURPOSES OF APPEAL

Comes now, Defendant by and through his counsel and Moves this Court to find that he is indigent for purposes of appeal and for cause would show:

1. Counsel was retained by defendant's parents for the purpose of trial only.
2. That neither Defendant nor his parents can afford counsel for an appeal or to pay for the transcripts.
3. That Defendant has been incarcerated without out any means of generating income for over 4 years.
4. That Defendant has received a sentence of 20 years and will not ever be able to retain counsel while incarcerated.
5. That counsel has mailed an affidavit of indigency to Mr. Young and he has not received it, Counsel has directly spoken to Mr. Young concerning his financial condition and counsel confirms these statements to be true to the best of his knowledge and belief.

Wherefore, premise considered, the Defendant requests that this Court enter an order finding him indigent so he can proceed with his appeal.

The
CLAIBORNE FERGUSON
Law Firm, P.A.
294 Washington Avenue
Memphis, Tennessee 38103
(901) 529-6400
Claiborne@midsouthcriminaldefense.com

/s/Claiborne H. Ferguson
CLAIBORNE H. FERGUSON (BPR 20457)

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April 2024, I served a true and correct copy of the foregoing upon the person(s) listed below by the following method(s) of service:

- Depositing it in the U.S. mail, first class postage prepaid and properly addressed;
- Hand delivery;
- Facsimile transmission
- Electronic Transmission - PACER

U.S. Department of Justice
Criminal Division, Fraud Section
202-257-5852

/s/ Claiborne H. Ferguson